



## DRAFT MEMORANDUM

**TO:** Co-Chairs of the Federal Interagency Climate Change and Water Resources Workgroup

**From:** Co-Chairs; Advisory Committee on Water Information (ACWI); Water Resources and Climate Change Workgroup

**Subj:** Comments on Draft 2014 Highlights of Progress and 2015 Implementation Plan for the *National Action Plan: Priorities for Managing Freshwater Resource in a Changing Climate*

**Date:** March 26, 2015

Thank you for the opportunity to review and comment on the Draft *2014 Highlights of Progress and 2015 Implementation Plan for the National Action Plan: Priorities for Managing Freshwater Resource in a Changing Climate (NAP)*.

In general, we commend the Federal agencies for the continuing effort to implement the NAP and to describe this effort in annual workplans and summaries of progress to date. This information is helpful to us as we evaluate the work that Federal agencies are doing to adapt water resources management to a changing climate and advise agencies of issues and opportunities in this important area.

This draft report provides a useful summary of key implementation actions in 2014 and work now planned for 2015. We offer the following more specific comments:

- 1) **Agency Climate Adaptation Plans:** We encourage Federal agencies to work to strengthen the connection between the Agency-specific climate change adaptation plans recently developed in response to EO 13653 and interagency climate plans such as the NAP. We believe that agency plans can be an important tool for marshalling the resources to address pressing needs related to water resources and climate change. Existing agency plans should more specifically contribute to the tasks identified in the NAP and the 2015 implementation plan for the NAP should more clearly describe how agency-specific plans support its implementation.

- 2) **Coordination Among Crosscutting Climate Strategies:** The NAP is one of several interagency climate adaptation plans addressing a sector where multiple Federal agencies have significant roles. Other plans that address crosscutting topics include the *Fish, Wildlife and Plants Climate Adaptation Strategy* and the climate section of the *National Ocean Policy* implementation plan. As there is some overlap in the topics addressed by these strategies, and opportunities for coordinated actions, we recommend that Federal agencies implementing these strategies more affirmatively coordinate their work.
- 3) **Integration of Water Actions in Recent Climate Plans:** Several recent reports identify needed actions related climate change and water Resources, including the *Report to the President* by the State, Local and Tribal Leaders Task Force and the *Priority Agenda: Enhancing the Resilience of America's Natural Resources* developed in response to EO 13653. These reports address a range of climate adaptation challenges but include some recommended actions related to water. The draft 2015 implementation plan identifies some of the key actions from these reports related to water but should do more to explain how these new initiatives will be integrated into existing efforts.
- 4) **Federal Agency Regional Deployments:** The *Priority Agenda: Enhancing the Resilience of America's Natural Resources* identifies the need for Federal agency offices at the regional level to strengthen coordination and present a more unified service to climate change decision-makers and the public. Many of these regional Federal organizations work on climate adaptation issues related to water and Federal agencies implementing the NAP should consider how water resources adaptation needs can best be addressed by these Federal regional organizations.
- 5) **Recommendation for Integrated Water Resources Management:** We believe that continued development of Integrated Water Resources Management (IWRM) will have significant benefits for the work to adapt water resources to a changing climate. After some substantial early success, the Federal agency actions related to this topic seem to have declined. We urge to Workgroup to review this topic and consider strengthening actions in support of IWRM.
- 6) **Expand Reference to Recent Flood Standards:** A key recent development related to climate change and water resources is the publication of the new Federal flood standard and the request to Federal agencies to develop guidelines to implement the new standard. This topic, and the impacts this work may have for climate resilience, should be more fully addressed in the draft 2015 implementation plan.
- 7) **Funding for Water Resources Adaptation to Climate Change:** We appreciate that Federal funding decisions are made as a result of agency-specific budget development processes and that actions called for in interagency plans often are not top priorities of individual agencies. The unintended consequences of this budget

planning model can be the lack of funding for critical actions which require the contributions of multiple agencies. We recommend that the interagency workgroup identify a small number of critical interagency efforts where funding is needed and work with appropriate agencies and the Office of Management and Budget to explain the importance of these critical projects and identify funds that will move them forward.

- 8) **Proposal to Defer Pilot Climate Change Vulnerability Index:** The draft 2015 implementation plan proposes to “stop or delay” work on the action calling for development of a pilot climate change vulnerability index for a major category of water facilities. As noted above, we appreciate the difficulty in funding projects that require interagency cooperation and recognize that agencies face significant resource constraints. We believe, however, that there is still a need for tools to understand the relative risk that climate change poses to different types of water infrastructure and that resources such as an index would be especially useful because agencies face resource constraints. We urge the interagency workgroup not to abandon efforts to develop a vulnerability index on a pilot basis.

Thank you again for the opportunity to comment on the draft 2014 highlights and 2015 implementation plan for the NAP. We look forward to working with you in this important effort.

cc: Members of ACWI Water Resources Adaptation to Climate Change Workgroup